

Rocky Flats Cleanup Commission

1738 WYNKOOP SUITE 302
DENVER, COLORADO 80202
(303) 298-8001

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William Kemper, Ph.D.
Denver 238-2148
Ken Lichtenstein, MD
Denver 333-3077
Tom Rauch
Denver 832-4508

February 19, 1990

David P. Simonson, Manager
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Dear Mr. Simonson:

This letter presents the Rocky Flats Cleanup Commission's comments on the Responsiveness Summary (January 1990) for Proposed Interim Measures/Interim Remedial Action Plan and Decision Document - 881 Hillside Area. The comments are broken into two sections: general and specific.

GENERAL COMMENTS

The organization of the document was good; it listed comments and cross indexed these with the issues. This provided a basis for each reader to follow his issue of concern.

The tone and technical content of the document were viewed with disappointment. While it is recognized that past DOE responses have been somewhat autocratic, the opening of the doors into its operations have spotlighted actions placing new demands on DOE. The condescending, adversarial nature and lack of quality in the answers indicates that a long learning curve remains before real openness can be achieved. The catch phrase of several years ago - "Where's the Beef?" - probably best sums up the Rocky Flats Cleanup Commission's reaction. Major concerns were just not addressed. For example, many comments were answered as being "quite correct" followed by vague remarks that DOE would do "something" about it - but never saying what that something was.

The Rocky Flats Cleanup Commission has a goal of pursuing quality in the work to be done at the Facility. This is the first time that the Rocky Flats Cleanup Commission has had an opportunity to participate in the decision making process and we view this as precedent setting. Our attitude is one of seeing that the process starts off correctly, and that the many details are accounted for. This approach will lay the groundwork for subsequent clean-up activities. No construction should start until all the documentation for the activity has been defined and approved.

The Rocky Flats Cleanup Commission would like to be notified of the availability of documents prior to start-up of activities. This request includes notification of construction as soon as a date has been set.

We are also requesting a list of documents and studies that have been initiated by questions.

SPECIFIC COMMENTS

A complete, detailed job safety analysis (Health and Safety Plan) needs to be completed. This would include training documents for workers, clean rooms for changing of clothes, equipment cleaning procedures, etc. This plan should also include notification and detailed plans for off-site persons during high wind conditions or other potential off-site movement of pollutants. All OSHA requirements for toxic and hazardous exposure should be included in this document.

A registry of worker information, health effects and other exposures needs to be established and tracked for 35 years. This registry should be available for research into health effects of various pollutant exposures. Such studies would assist in addressing the problems of synergistic effects of multi-contaminant exposure by workers (and off-site personnel). OSHA has established procedures for these registries and these should be used as guidance.

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Many questions remain concerning the reentrainment of particles from earth disturbance activities. Detailed soil characterization studies are needed. Until these studies are complete, worst case assumptions should be used. Closely defined transportation routes need to be established to minimize the disturbance of crustal material - this may include the staking of areas for use and/or non-use. These routes would include not only equipment movement but personnel movement (foot traffic) as well.

A detailed protocol needs to be developed to define under what conditions construction will be terminated, such as high wind, and what action will be taken to mitigate problems during suspensions - such as a watering or soil stabilization program. This would include detailed procedures for both stopping and restarting construction and the placement of equipment and personnel during these times.

The proposed monitors may or may not be sufficient. Studies of stability wind patterns for dispersion of pollutants need to be done. Based on these studies, monitors should be installed. At a minimum, four monitors at 90° angles within 100 yards of the site should be used.

Detailed logs and records need to be maintained. These would include all activities; the times and types of equipment use, the area disturbed with time, work permits, excavation permits, logging of data (meteorological, soil moisture, moisture tests, monitor calibrations, sample changing and chain of custody logs, history of equipment movement and decontamination, etc.), and other data collection activities. There must be activity planning such that sample turn-around time is included in the process; an example would be haul trucks that are sampled and then released before the samples are analyzed.

It is still requested that DOE follow up on studies to define ground water plume sources. A listing of all studies being done and documents available are requested for our review.

The Rocky Flats Cleanup Commission appreciates the opportunity to assist in these important and difficult clean-up activities. We hope you find our comments helpful and we look forward to an even closer working relationship in the future.

Sincerely yours,

ROCKY FLATS CLEANUP COMMISSION


Joe Tempel, President

1. The Rocky Flats Cleanup Commission requests copies of all permits required for the various activities.